

Heftel Broadcasting

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The use of channel 300C1 at Lewisville, TX according to the material in the Heftel petition results in 60 dBu coverage to 2,941,838 persons in an area of 16,313 square kilometers. Relocation of channel 300 from Gainesville to Lewisville results in a gain of 2,794,732 persons residing in an area of 7,805 square kilometers. All of the gain and loss area involved in this modification is currently provided service by at least five other stations. These stations are:

KLIF	Dallas, Texas	570 kHz
KSKY	Balch Springs, Texas	660 kHz
KPBC	Garland, Texas	770 kHz
WBAP	Fort Worth, Texas	820 kHz
KRLD	Dallas, Texas	1080 kHz.

The 0.5 mV/m contours of these stations were determined employing FCC computer database information and conductivity values from the Commission's Figure M-3 Conductivity map. The coverage contour of each station was determined employing the method outlined in 47 CFR 73.183.

¹ The Heftel petition indicates this coverage to affect 5,438 square kilometers containing 68,347 persons.

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CORSICANA/ROBINSON ALLOCATION

All population and area data associated with the proposed change at Corsicana/Robinson as shown in Exhibit E-5 of the Sorensen Technical Exhibit have been found to be correct. All of the loss area involved in this modification is currently provided service by at least the five other stations referenced on the preceding page.

With regard to the reallocation of channel 300C1 from Corsicana, Texas to channel 300A at Robinson, Texas, the attached map, Figure 1, was prepared to show an area where it is possible to locate a channel 300A transmitter site, from which, 70 dBu service can be provided to all of Robinson, Texas, but to less than 50 percent of the Waco, Texas Urbanized Area.² The reference coordinates for Robinson and the city of Waco are 9.6 kilometers apart.

With careful site selection, it is possible to provide 70 dBu service to all of Robinson but to 50 percent or less of the Waco urbanized area. Figure 1 shows three theoretical sites, which form the corners of a triangle containing about 16 square kilometers, in which a transmitter site for a station operating with maximum class

² The original Heftel petition incorrectly considered the Waco urbanized area as consisting of all of McLennan County. The actual Waco urbanized area as described in the 1990 Census of Population and Housing, U.S. Department of Commerce document 1990 CPH-2-45, is shown on the attached map, Figure 2.

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A facility on channel 300 can provide service as described. From Site 1 approximately 50 percent of the Waco urbanized area is within the predicted 70 dBu contour, while from Sites 2 and 3, the Waco urbanized area coverage is reduced to below 50 percent. In the cases of sites 1, 2 and 3, complete principal community coverage of Robinson is maintained.

The geographic coordinates for the three sites are:

Site No. 1.	31° 26' 26" North Latitude
	97° 04' 04" West Longitude
Site No. 2.	31° 27' 18" North Latitude
	97° 02' 33" West Longitude
Site No. 3.	31° 24' 53" North Latitude
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MINERAL WELLS, TEXAS

Since filing of the Heftel petition, an application was filed with the FCC by the licensee of station KYXS Mineral Wells, Texas, File No. BPH-910517KD, requesting facilities of a Class C1 station. The current KYXS operation provides 60 dBu service to 63,792 persons in an area of 4,348 square kilometers. The proposed operation (at the proposed site) would cover 16,297 square kilometers

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in which 421,536 persons reside, a gain of 357,744 persons in 11,949 square kilometers.

The five AM stations tabulated above provide service to all of the existing and proposed KYXS coverage area.

POPULATION AND AREAS

Population totals were determined by summing centroids of enumeration districts which fell within the area of interest. The 1990 census was employed. Areas were determined by computer program.

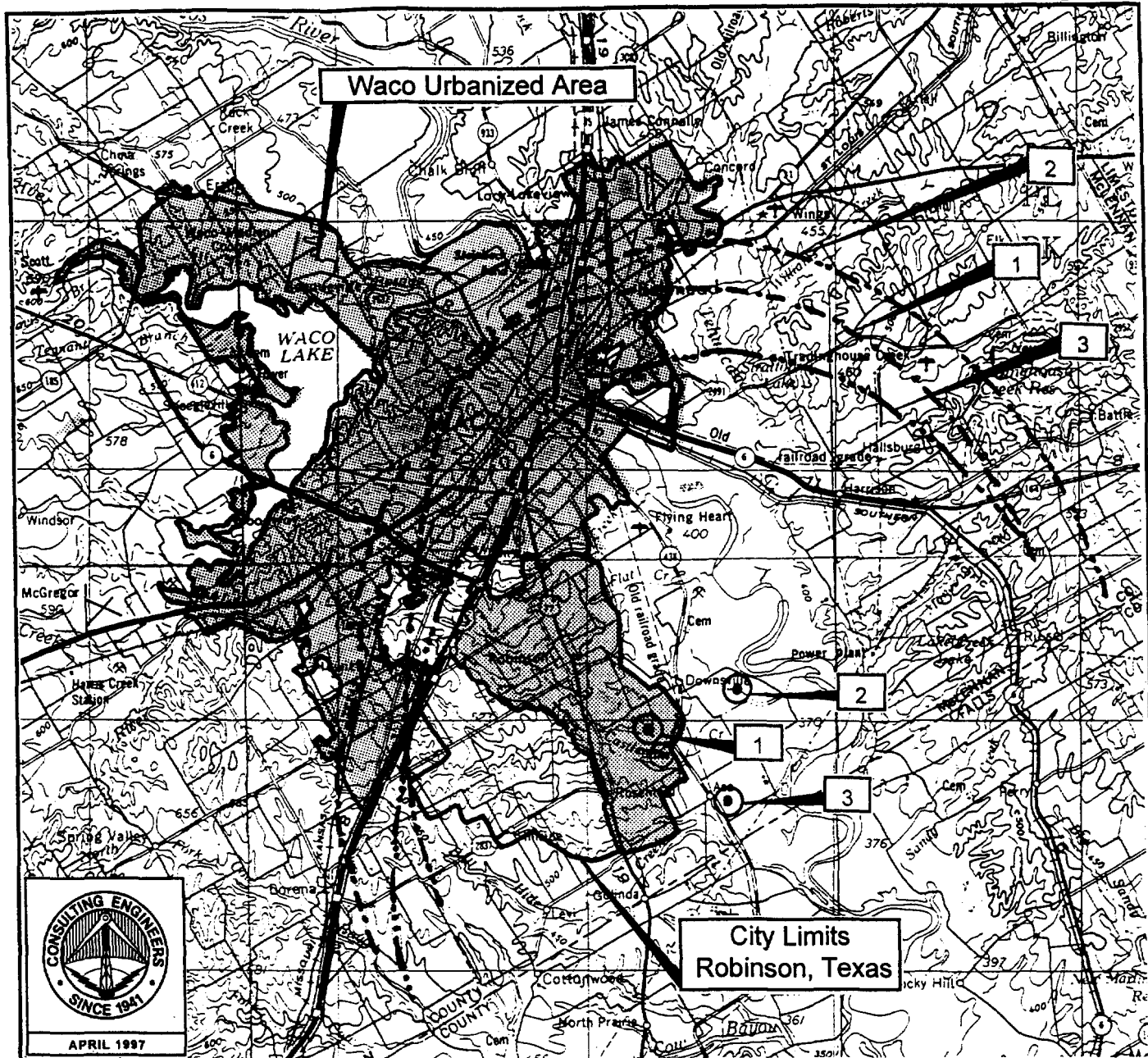
The information contained herein is true and correct to the best of my knowledge and belief.



Louis R. du Treil, Sr.
du Treil, Lundin & Rackley, Inc.
240 N. Washington Boulevard
Suite 700
Sarasota, FL 34236
(941) 366-2611

April 28, 1997

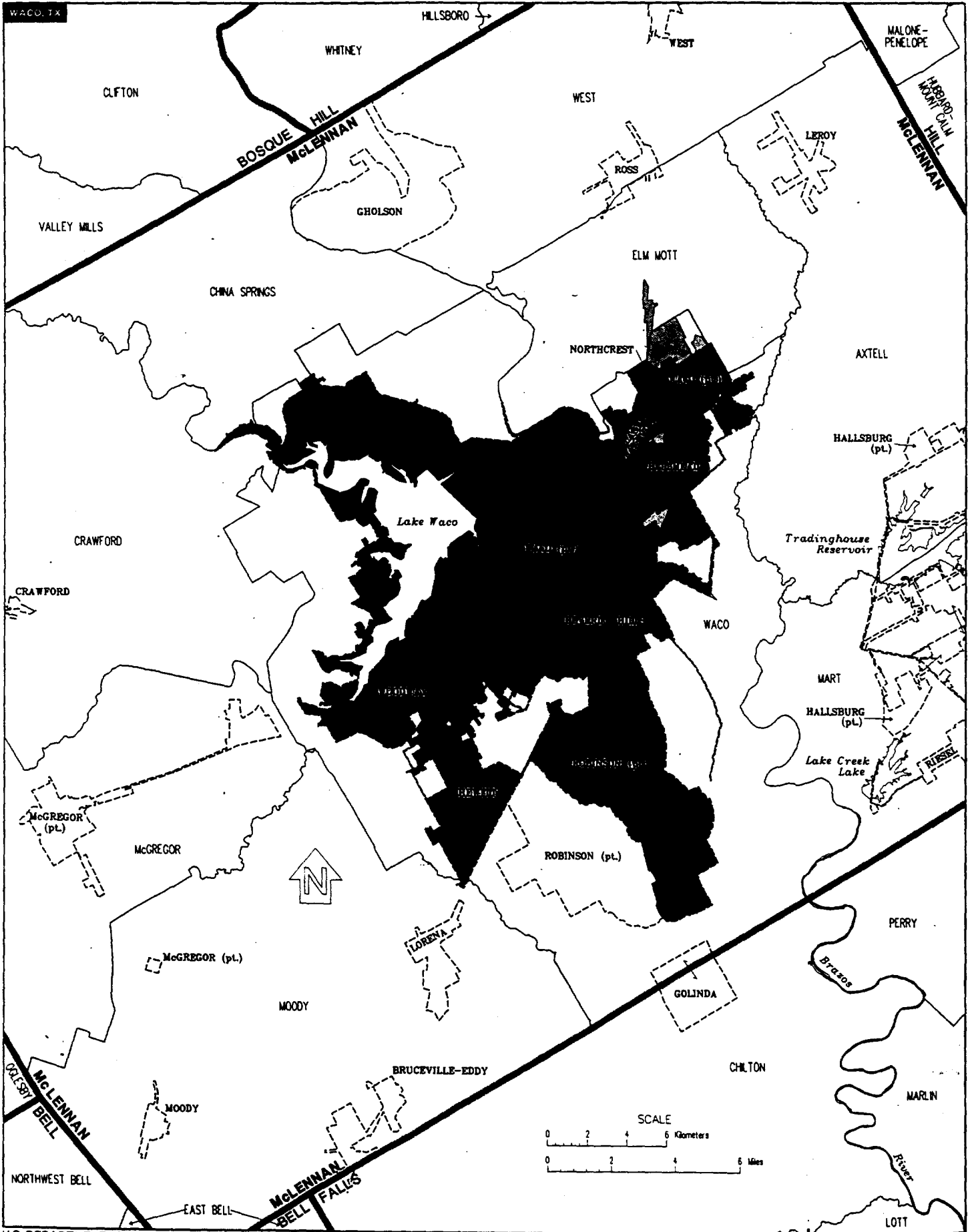
Figure 1



PREDICTED 60 dBu CONTOURS
HEFTL BROADCASTING CORPORATION
MM DOCKET NO. 97-91
 du Treil, Lundin & Rackley, Inc. Sarasota, Florida

Urbanized Areas

Figure 2



U.S. DEPARTMENT OF COMMERCE Economics and Statistics Administration Bureau of the Census

G-60 TEXAS

MAPS

ATTACHMENT 2

ORIGINAL

du Treil, Lundin & Rackley, Inc.

A Subsidiary of A. D. Ring, P.C.

TECHNICAL EXHIBIT
PREPARED FOR
HEFTEL BROADCASTING CORPORATION
MM DOCKET NO 97-91
RM-8854

Technical Statement

This statement and attached maps, Figures 1 and 2, were prepared on behalf of Heftel Broadcasting Corporation, petitioner for change in the FM Table of Allotments, 47 CFR 73.202(b) affecting six Texas cities. This exhibit provides information not contained in the original Heftel petition and corrects population and area data associated with the proposed allocation change at Gainesville/Lewisville, TX.

GAINESVILLE/LEWISVILLE ALLOCATION

Heftel holds a construction permit for station KECS(FM) on channel 300C3 at Gainesville. It is proposed to delete the allotted channel 300C2 at Gainesville and in its place to allocate channel 300C1 at Lewisville, Texas. The 60 dBu population and area receiving service from a hypothetical class C2 station operating with maximum facilities from a transmitter site at the reference geographic coordinates listed in the FCC computer database, consists of 147,106 persons in an area of 8,508 square

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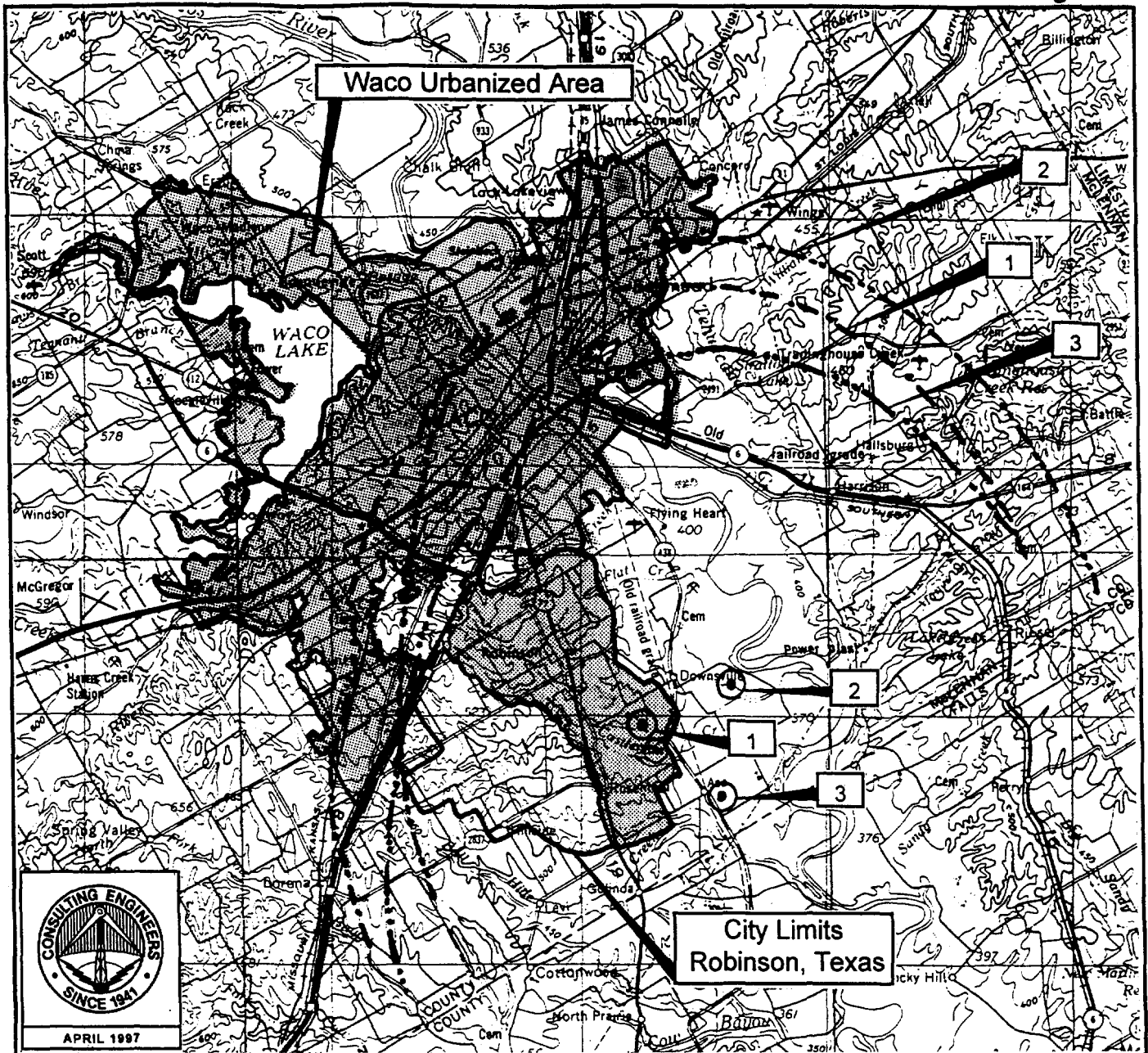
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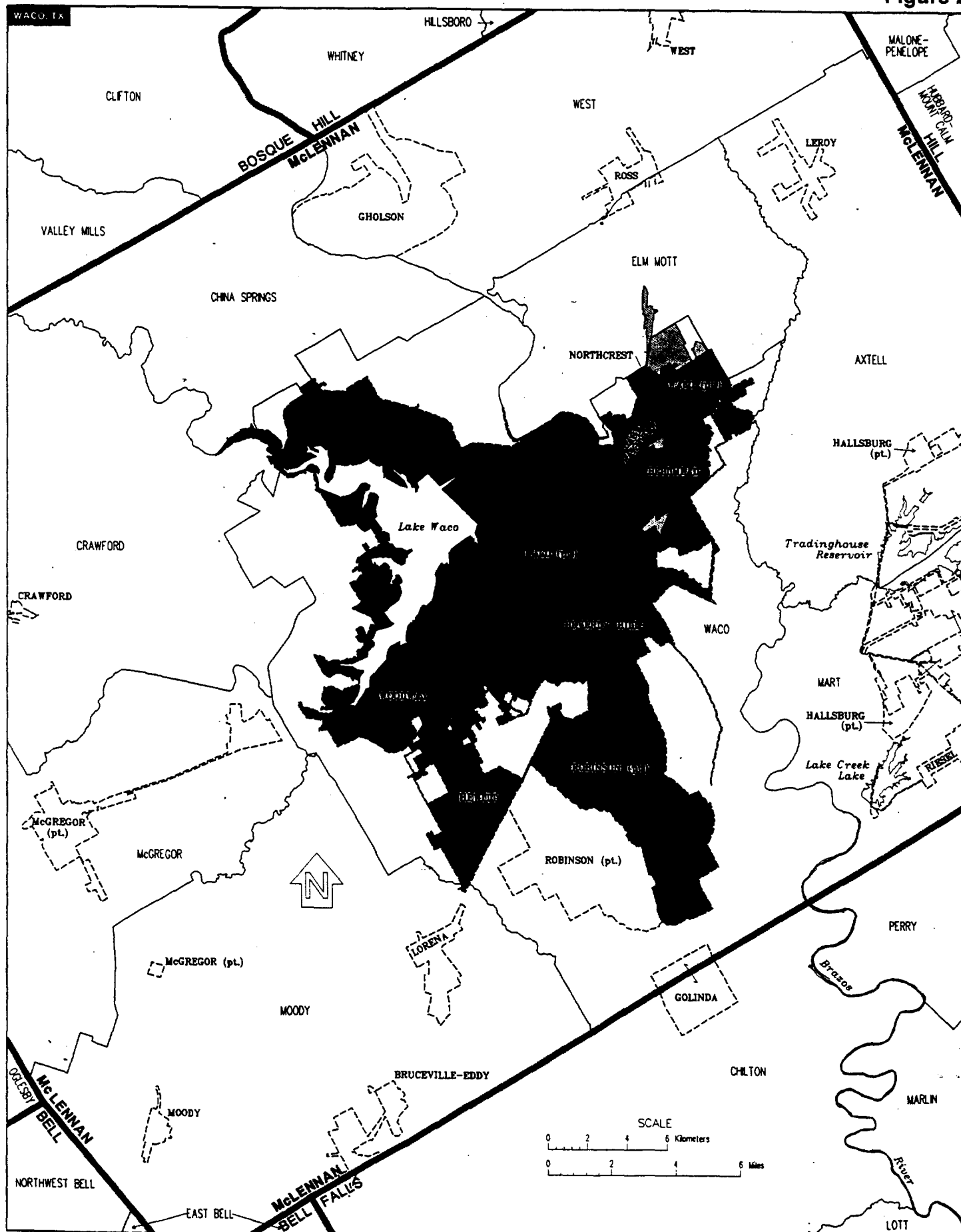
Figure 1



PREDICTED 60 dBu CONTOURS
HEFTel BROADCASTING CORPORATION
MM DOCKET NO. 97-91
 du Treil, Lundin & Rackley, Inc. Sarasota, Florida

Urbanized Areas

Figure 2



DECLARATION OF JANE GILMORE

I, Jane Gilmore, declare as follows:

1. I am a sole proprietor operating unofficially as "Gilmore Associates." I have been contracted by the Law Firm of Cohn and Marks to obtain information to be included as an exhibit to Comments filed in MM Docket No. 97-91, RM 8854.

2. Based on telephone conversations with city officials and members of the business community of Robinson; U.S. Census Bureau data from its official web site and telephone conversations with Census Bureau personnel; Minutes from Robinson City Council Meetings, and various materials forwarded by the President of the Fidelity Bank of Texas, I was able to obtain the following information.

First, I will address the eight characteristics identified by the FCC re: interdependence between Robinson and Waco, TX:

1) Extent to which community residents work in the larger metropolitan area:

Most of the residents work in Waco, however, 146 households earn farming self-employed income (CB).

2) Whether the smaller community has its own newspaper or other media that covers the community's local needs and interests:

Robinson does not have its own newspaper or radio station. There is a weekly insert in the Waco Tribune called "Neighbor" where local needs and interests are covered, although not adequately. There is also a weekly newspaper, The Hometown Weekly, which is published in Waco but distributed to areas outside of Waco (RS). Some advertisement is done on billboards along I-340 and the bank, along with other businesses, advertises via monthly statement packets (WS).

3) Whether community leaders and residents view the specified community as being an integral part of, or separate from, the larger metropolitan area:

The Mayor of Robinson, Max Renfro, the City Secretary, Linda Vranich, the President of the Chamber of Commerce, Mary Nell Jarvis, the President of Fidelity Bank of Texas, Pat Whatley, the Superintendent of the Robinson School District, Jim Smith; and Woodrow McMullin of McMullin Realtors and Builder all view Robinson as separate and distinct from Waco (See attached statements). Robinson's population density statistics (half rural/half urban)(CB), as well as its Census Bureau characterization (Extended City) differentiate Waco City (entirely urban and classified as a Metropolitan Area)(CB) from Robinson. There are number of other distinguishing features: Median household income, cost of housing, main industries, and type of activities engaged in by residents in their leisure time (CB and statements).

4) Whether the smaller community has its own local government and elected officials:

Robinson has its own local government and elected officials -- a mayor and a five-member city council (RB). The position of City Administrator is currently vacant (RS).

5) Whether the smaller community has its own telephone book provided by the local telephone company or zip code:

The zip code for Robinson is 76706. Waco has 14 zip codes, including 76706. However, less than 25% of Waco is covered by the 76706 code. Robinson had a City Directory last published by the Robinson Chamber of Commerce in 1987. It is currently being updated and will be published some time this summer. Robinson business advertised in the city directory and will advertise in the new one (VS). Southwestern Bell includes cities which border Waco in the Greater Waco telephone book (SWB).

6) Whether the community has its own commercial establishments, health facilities, and transportation systems:

Neither Waco nor Robinson have much in the way of public transportation. Over 90% of the population in both cities drive alone to work. According to Census Bureau data, only about 300 citizens of Waco City use public transportation. Robinson has a clinic with one general practitioner

and three employees which provides emergency and outpatient, non-specialized, services. There is also a dental clinic with three dentists. Robinson has one large family restaurant called the Rocket Cafe which serves the community breakfast and lunch, a variety of the usual fast food places, i.e. Sonic, Dairy Queen, etc., one major grocery store (Brookshire's Grocery), and a number of convenience stores (RS). The commercial establishments with the largest number of employees are: Johnson's Roofing (110-132), Blue Bell Ice Creameries (36) and Brookshire's Grocery (30-35) (VS).

7) The extent to which the specified community and the central city are part of the same advertising market:

According to Mayor Renfro, people from Waco, neighboring Hewitt and Woodway come to Robinson to do some of their shopping, i.e. buying cars, RVs and campers. Aside from Waco papers, radio and TV ads, advertising by Robinson business is done in county-wide and state-wide merchandise papers such as the Thrifty Nickel and the Goldmine (RS). Some businesses, including the Robinson branch of the Fidelity Bank of Texas, advertise services and products in newsletters and monthly statement stuffers. The bank is currently creating a Voice Response System which will have a community bulletin board for Robinson events (WS).

8) The extent to which the specified community relies on the larger metropolitan area for various municipal services such as police, fire protection, schools, and libraries.

Robinson is proud of its water treatment plant which utilizes a Reverse Osmosis system, a first of its kind in the State of Texas (VS, RS). The construction of this water treatment plant was funded by Robinson municipal bonds (RS). Waco uses Mount Carmel Treatment plant, located in the City of Waco. Both cities rely on the Brazos River Authority for Sewage Treatment (WCoC). Robinson has a sixteen member police force and its own volunteer fire department (RS). Robinson's school district has a rating of 3AHS and its students consistently score above the Texas state average in all grades on the Texas Academic Assessment Skills (TAAS) tests. The district consists of five schools in Robinson: Three elementary schools (grades K-12, grades 3-5, and grade 6), a junior high

school and a high school. The high quality of education received by Robinson students is considered to be one of the primary attractions for new residents who come to Robinson (RS, SS).

As I investigated the character of the City of Robinson and its residents, it became evident what things have shaped the city and still remain important to its residents:

History: Robinson has a rich and unique history. A historical sketch, included in the most recent Robinson City Directory, is attached.

How and where the residents of Robinson spend their time: The residents spend their time primarily in Robinson, with their families, at school events and related activities. School sports and Little League apparently occupy most of the residents' leisure time (RS). The Athletics department of the high school has most of its boys and girls going to advanced playoffs and the school marching band won the last two all state championships. There are booster clubs for the teams and the games are well-attended (RS, SS). The Robinson ISD, with its excellent record of academic achievement by its students and well-supported band and sports teams are a major attraction to new residents of Robinson (RS, SS). An example of the solid support enjoyed by students is a "band appreciation night" held for the band after the last championship win. There are annual parades and an annual "FunFest" sponsored by the Robinson Chamber of Commerce. Robinson residents are also civic-minded. The Lions Club of Robinson maintains the public pool, located in Youngblood Park. The Economic Development Committee works on attracting new business (RS, VS, SS). One of the most recent projects is putting Robinson on the World Wide Web (RS, MS).

How Robinson sees its future: In the past year, 100 new homes have been built and more are planned. There is a steady demand for two reasons, reasonable cost compared with the rest of mid-

Texas and Robinson's school district. There is land available for light industry and city officials are working on ways to attract businesses to come in (RS, MS).

General information:

Main industries in Waco are Retail, Educational Services, and Health Services (CB)

Main industries in Robinson are Retail, Manufacturing, Finance, Insurance and Real Estate (CB)

National origin: 464 Hispanic for Robinson, 16,722 for Waco (CB)

Educational attainment for Robinson is mostly high school graduate and some college (CB)

Educational attainment for Waco is 9-12 with no diploma, high school graduate, and some college (CB)

High school graduates tend to stay in Robinson or, if they leave, they later return (RS)

Waco characteristics v. Robinson:

Higher rate of poverty. (CB)

Higher percentage of households with incomes under \$37, 499 (80% v. 55 %) (CB)

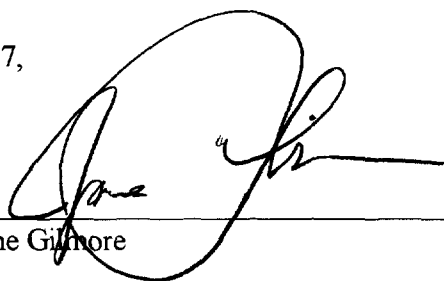
Approximately half the median income of households in Robinson. (\$17,852 v. \$34,898) (CB)

12.4% housing unit vacancy v. 4.75% in Robinson

85 square mile size v. 48 square mile size (WCoC, RB)

\$98,000 average cost of a house v. \$80,000 (WCoC, MS)

Executed under penalty of perjury this 5th day of May, 1997,



A handwritten signature in black ink, appearing to read 'Jane Gilmore', is written over a horizontal line. The signature is stylized with large loops and a long horizontal stroke extending to the right.

Jane Gilmore

ATTACHMENTS

1. Historical sketch of the City of Robinson
2. Statement of Max Renfro, Mayor of the City of Robinson
3. Statement of Pat Whatley, President, Fidelity Bank of Texas
4. Statement of Jim Smith, Superintendent of Robinson ISD
5. Statement of Woodrow McMullin, Owner, McMullin Realtors and Builder
6. Statement of Linda Vranich, City Secretary for the City of Robinson
7. Statement of Mary Nell Jarvis, President, City of Robinson Chamber of Commerce

HISTORICAL SKETCH

The greatness of a city depends upon the greatness of its people--men and women from all walks of life. A progressive community must have individuals with courage, energy, patience, and the highest spiritual and moral ideals. These qualities characterized the founders of Robinson as well as many of its citizens today who are continuing to build for greater things.

CITY GOVERNMENT OFFICIALS

City Hall, 104 W. Lyndale Phone 662-1414

Mayor Doyle Hunton

City Secretary Mrs. Harry Thompson

Councilmen - Evans Reese, Author Staas, Bob Gordon,
A. G. Krumnow, and Charles Olson

THE CITY OF ROBINSON

Robinson's history is a dramatic story of the great immigration into Texas after 1850. Colonists poured into this area of Central Texas in great numbers. In the year of 1852 Mr. John Robinson of Scotch-Irish descent arrived with his wife, Sophia, and four sons seeking a new home and better health. They came from Demopolis, Alabama bringing with them five slaves. Partly by purchase, at a price from \$1 to \$5 per acre and partly by location of certificate, he became owner of nearly 2,000 acres. He built his home of cedar logs on a site known as the J. W. Mann farm on Flat Creek six miles from Waco Village which was only three years old at the time. He had 500 acres in cultivation, and 1,000 acres of pasture which were well stocked with cattle. Plenty of deer and antelope could be found in the wooded areas. Mr. Robinson became one of the most successful farmers of McLennan County. Relatives and friends were urged to come to Texas and soon John's brother Levi with his wife Eliza and son Austin arrived and built their home nearby.

At this time the Old Robinson Road was known as the Waco-Cameron Road and a stage coach line was operated from Waco to Cameron to Hempstead. It was along this road in a two block area from Mrs. Martha Hague's home to F. B. Strickland's home that stores, blacksmith shop, gin, meat market, doctors' offices, and one saloon were built in later years.

There were a few pioneer families in the area even before the Robinsons came and then many more came to make their homes here. Some of these are M. L. Strickland, Capt. Wm. F. Hague, D. R. and J. H. Tinsley, Wm. Cornforth, John P. Majors, L. B. Estes, Wm. G. Evans, J. F. and D. F. Abernathy, W. E. Stovall, M. E. Stegall, F. H. Rogan, W. G. Daniels, Nelson and E. F. Thomasson, A. B. Denison, A. J. McMurry, J. C. Simons, L.B. Foster, L. B. Daughtrey, N. R. Harris, Thomas J. Andrews, J. H. McKee, T. L. Hobbs, B. F. Gassaway, H. L. Quinius, John Strauss, Herman Staas, Henry, William and Fred Schaeper, Henry and Fred Frese, Wm. Kettler, and Herman Rueter.

There are four doctors' names mentioned in the history of Robinson: Dr. Mabry T. Cox, Dr. J. A. Metcalf, Dr. J. C. Woods, and Dr. T. J. Everett.

John Robinson deeded his land to his five sons, John Henry, Joseph L., Edward L., James Reed, and Richard Arthur, who later in 1867 set apart 171 acres of land and divided it into 4-acre lots for homesteads. In 1866 Mr. Ed Robinson put up a store building of cedar logs and carried on extensive business in general merchandise. It was the Robinson family that gave the land for the Robinson School and the Presbyterian Church and also named the streets after the town was plotted in 1873.

EARLY INTEREST IN SCHOOLS AND CHURCHES

In 1853 the Robinson family hired a young teacher, Mr. Moore from Fayette County to teach their children. He lived and boarded in the home and was paid \$20 monthly. A small neat cabin 18x18 ft. with a fireplace in it served as the first school building. Later in 1860 Mr. Robinson built a larger building where the Presbyterian Church is today and a Mr. Goodrich was engaged for the first teacher. A Mr. Lee was his successor followed by Prof. F. H. Rogan who also served as a Presbyterian pastor. There were about 100 students in the school, some coming from other areas and boarding in the Robinson home.

Later, school was held in the Grange Building near present Baptist Church, but on May 8, 1888 it was completely destroyed by a tornado. A group of citizens formed a stock company and built the Robinson Grade School in Fall of 1888, and for a number of years it was both a public and private school with Rev. John Strauss as the principal. In 1898 Mr. Strauss bought out all the stock and the school became the Robinson Academy. It was the center of social and civic activities. It was also a boarding school for many who came from out of the area. From 1888 to 1922 about 1,000 students attended the Academy. In 1922 it was sold to the Evangelical

Synod of North America and was operated by them until a fire of Nov. 1928 destroyed the building. It stood on the land now owned by E. H. O'Dowd and the remains of the basement may be seen today. Robinson Public School was operated in a 2-room building from 1898 to 1916 in a home that Robt. Johnson sold to the Baptist Church for a parking area. In 1916 the red brick building at the Elementary School was built. There have been several additional buildings added in the past few years with the growth of Robinson.

In 1865 Mr. Robinson freed his slaves and he deeded 4.8 acres of land for the purpose of a school and church site. A school was built called the Post Oak Academy and a Mr. Dorsey was one of the first teachers. The deed was handwritten and is in the files of the St. Paul's Church which was also built on this land.

The Robinson Baptist Church, originally called the Baptist Bethel, was organized Sept. 11, 1866 and is more than one hundred years old.

As early as 1855 a Presbyterian Church had been organized by the Robinson family who were devout Presbyterians. It later lapsed and was reorganized in 1866 and again in 1874 and has had continued growth since that time.

In 1882 Mr. and Mrs. Herman Staas came from Germany and settled in the Robinson community and they sent back favorable reports on the country. After them Henry, William and Fred Schaeper, Henry Frese, and Fred Frese, and Henry and William Kettler and their families all came here. They along with the John Strauss and Herman Quinius and Herman Rueter families organized the Evangelical Church in 1884.

The growth of this community was gradual and continuous and in 1955 it was incorporated into a City whose municipal affairs are conducted by a Mayor and five councilmen. The corporate limits are 16 square miles with a population of approximately 4,000.

BUSINESS DEVELOPMENT

With the growth in population in Robinson, new business firms and service establishments have come into being to meet the needs of this growing community. Several new businesses have been established within the past year and others are in prospect for the near future. The city government has a strict zoning law which forbids undesirable establishments within the community and which will have a tendency to mold the business district of Robinson into an attractive shopping center.

AGRICULTURE

Robinson is located in a prosperous Central Texas agricultural area devoted to diversified farming. Within the vicinity may be found some of the finest commercial and registered herds of both dairy and beef cattle.

A CITY MEETS ITS PROBLEMS

The City officials of Robinson have had many problems which are contingent with a rapidly growing community. Many of these problems have been met with the cooperation of citizens and organizations within the community. A number of community projects have been completed by churches, Parent-Teacher Association, Boy Scouts, Camp Fire Girls, clubs and other organizations. In 1957 the Chamber of Commerce was organized which functions through several standing committees which are available to cooperate with the city government in many ways.

RESIDENTIAL DEVELOPMENT

Residential development is one of the major industries of Robinson. Many beautiful homes are being constructed and/or have been completed within the past five years. Price range from approximately \$8,500 to \$40,000. Approximately eleven new additions have been opened for future residential development. An estimated 2,000 homesites, ranging in size from 11,250 square feet to five acres are being made available to future home-owners of Robinson. Furthermore, hundreds of other lots can be developed within the city limits.

Some of the larger additions are restricted, curbed and guttered and will have paved streets. They are supplied with natural gas, artesian water, electricity, police protection, fire protection, telephone, mail delivery, and other services. There are no city taxes for any purpose.